

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

V.

Civil Action No.
2:17-cv-11633-JCO-EAS

FCA US LLC,)
 FIAT CHRYSLER AUTOMOBILES N.V.,)
 V.M. MOTORI S.P.A.)
 and)
 V.M. NORTH AMERICA, INC.,)

Defendants.

NOTICE

The United States hereby provides notice to the Court that the above-captioned matter is an action by the United States for injunctive relief and civil penalties involving factual questions in common with those at issue in the multi-district litigation captioned *In re Chrysler-Dodge-Jeep Ecodiesel Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2777, pending before the Honorable Edward M. Chen of the United States District Court for the Northern District of California. The United States intends to file today with the Clerk's Office of the United States Judicial Panel on Multidistrict Litigation a Notice of Potential Tag-Along Action, identifying the complaint in this action as appropriate for inclusion in

the multi-district litigation for coordinated pretrial proceedings.

Respectfully submitted,

JEFFREY H. WOOD
Acting Assistant Attorney General
United States Department of Justice
Environment & Natural Resources Division

s/ Leigh P. Rendé
LEIGH P. RENDÉ (PA203452)
Trial Attorney
JOSEPH W.C. WARREN
Senior Counsel
EMILY C. POWERS
Trial Attorney
United States Department of Justice
Environment & Natural Resources Division
Environmental Enforcement Section
PO Box 7611, Ben Franklin Station
Washington, DC 20044
(202) 514-1461 (Rendé)
leigh.rende@usdoj.gov
(202) 616-1303 (Warren)
joseph.warren@usdoj.gov

LOCAL COUNSEL:

DANIEL L. LEMISCH
Acting United States Attorney
Eastern District of Michigan

LYNN DODGE
Assistant United States Attorney
United States Attorney's Office
211 W. Fort Street, Suite 2001
Detroit, MI 48226
(313) 226-0205
lynn.dodge@usdoj.gov

OF COUNSEL:

Kathryn Pirrotta Caballero, Senior Attorney
Caitlin Meisenbach, Attorney Advisor
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2017, I electronically filed the foregoing Notice with the Clerk of the Court using the ECF system. I hereby certify that I have sent by United States Postal Service and electronic mail the foregoing Notice to the following attorneys for defendants:

Robert J. Giuffra, Jr., Esq.
William B. Monahan, Esq.
Darrell S. Cafasso, Esq.
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
(212) 558-4000
giuffrar@sullcrom.com
monahanw@sullcrom.com
cafassod@sullcrom.com

Granta Y. Nakayama, Esq.
Ilana S. Saltzbart, Esq.
Joseph A. Eisert, Esq.
KING & SPALDING LLP
1700 Pennsylvania Avenue NW
Washington, D.C. 20006
(202) 737-0500
gnakayama@kslaw.com
isaltzbart@kslaw.com
jeisert@kslaw.com

Attorneys for FCA US LLC, Fiat Chrysler Automobiles N.V., VM Motori S.p.A., and VM North America, Inc.

s/ Leigh P. Rendé
LEIGH P. RENDE
Trial Attorney
United States Department of Justice
Environment & Natural Resources Division
Environmental Enforcement Section
PO Box 7611, Ben Franklin Station
Washington, DC 20044
(202) 514-1461
leigh.rende@usdoj.gov